## UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NEW YORK

BLACK LOVE RESISTS IN THE RUST by and through its Co-Directors NATASHA SOTO and SHAKETA REDDEN and on behalf of its members; DORETHEA FRANKLIN; TANIQUA SIMMONS; DE'JON HALL; and JANE DOE, individually and on behalf of a class of all others similarly situated;

Plaintiffs,

Case No. 1:18-cv-00719-CCR JUDGE REISS

- vs -

CITY OF BUFFALO, N.Y.; BYRON B. BROWN, Mayor of the City of Buffalo, in his individual and official capacities; BYRON C. LOCKWOOD, Commissioner of the Buffalo Police Department, in his individual and official capacities; DANIEL DERENDA, former Commissioner of the Buffalo Police Department, in his individual capacity; AARON YOUNG, KEVIN BRINKWORTH, PHILIP SERAFINI, ROBBIN THOMAS, UNKNOWN SUPERVISORY PERSONNEL 1-10, UNKNOWN OFFICERS 1-20, each officers of the Buffalo Police Department, in their individual capacities.

*Defendants.* -----x

## MOTION TO WITHDRAW AS COUNSEL

Pursuant to Rule 83.2(d) of the Local Rules of the United States District Court for the Western District of New York, Plaintiffs Black Love Resists in the Rust ("Black Love Resists" or "BLRR") and individual plaintiffs and class representatives, Dorethea Franklin, Taniqua Simmons, De'Jon Hall, and Jane Doe, by and through counsel, respectfully move the Court to allow Anjana Malhotra to withdraw as counsel of record in the above-captioned proceeding. I

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have accepted a position with the New York State Attorney General's Civil Rights Bureau as an Assistant Attorney General. No party will be prejudiced or otherwise affected by my withdrawal, as there is ample excellent and able co-counsel representing plaintiffs on this matter.

Dated: June 26, 2019

Respectfully submitted,

/s/ Anjana Malhotra

Anjana Malhotra (cooperating counsel) CENTER FOR CONSTITUTIONAL RIGHTS 666 Broadway, 7<sup>th</sup> Floor New York, NY 10012 212-614-6439 anjana.malhotra@gmail.com

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 26th day of June, 2019, I served the foregoing Motion to Withdraw as Counsel on

Robert E. Quinn Assistant Corporation Counsel 65 Niagara Square, 11th Floor Buffalo, New York 14202 (716) 851-4326 rquinn@city-buffalo.com

by filing a true and correct copy of it with the Court using the CM/ECF system, which caused notice to be sent notice to all counsel of record who are registered with the CM/ECF system.

/s/ Anjana Malhotra	
Anjana Malhotra	